

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

S.L., by and through his parents and guardians,  
J.L. and L.L.,

Plaintiff,

v.

PREMERA BLUE CROSS, AMAZON  
CORPORATE LLC GROUP HEALTH AND  
WELFARE PLAN, AND AMAZON  
CORPORATE LLC,

Defendants.

Case No. 2:18-cv-01308-RSL

DECLARATION OF ELEANOR HAMBURGER  
IN SUPPORT OF PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT

I, Eleanor Hamburger, hereby declare under penalty of perjury and in accordance with the laws of the State of Washington and the United States that:

1. I am one of the plaintiff's lawyers in this case.
2. Attached as Exhibit A are excerpts of the deposition of Robert Small, M.D., taken on April 16, 2021 in *P.E.L et al v. Premera Blue Cross*, Case No. 19-2-256109-SEA (Wash. Superior Court).

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1 DATED: January 13, 2023 at Seattle, Washington.

2 s/ Eleanor Hamburger

3 Eleanor Hamburger, WSBA No. 26478

4 Email: ehamburger@sylaw.com